

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: NRG Wholesale Generation LP	Operator ID#: 31999
Inspection Date(s): 10/28/2014, 10/29/2014, 10/30/2014	Man Days: 3
Inspection Unit: NRG Wholesale Generation LP	
Location of Audit: Neoga	
Exit Meeting Contact: Gil Smith	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Aaron McElravy	
Company Representative to Receive Report: Gil Smith	
Company Representative's Email Address: gil.smith@nrgenergy.com	

Headquarters Address Information:	344A RR 1 Centerline Road Neoga, IL 62447 Emergency Phone#: (866) 497-2284 Fax#:	
Official or Mayor's Name:	Donald Claybaugh Phone#: (630) 771-7813 Email: donald.claybaugh@nrgenergy.com	
Inspection Contact(s)	Title	Phone No.
Gil Smith	Plant Manager	(217) 844-4404

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u> <i>The procedure for telephonic notices of incidents is located on Page 7, 1a.</i>		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u> <i>NRG is not a distribution operator.</i>		
[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Not Applicable

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General Comment:		
<i>NRG is not a distribution operator.</i>		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Satisfactory
General Comment:		
<i>The procedures for federal and state regulatory reporting are located on Pages 7-9 Sections 1 and 2. The procedures include the reporting requirements, time intervals, instructions for filing and submission of supplemental reports if warranted.</i>		
[192.605(b) (4)][191.15(c)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Satisfactory
General Comment:		
<i>The procedures for federal and state regulatory reporting are located on Pages 7-9 Sections 1 and 2. The procedures include the reporting requirements, time intervals, instructions for filing and submission of supplemental reports if warranted.</i>		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
General Comment:		
<i>The procedures for reporting safety related conditions are located on Pages 123-127 and include the intervals for reporting and examples to assist personnel in determining conditions that require reporting.</i>		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
General Comment:		
<i>The procedures for reporting safety related conditions are located on Pages 123-127 and include the intervals for reporting and examples to assist personnel in determining conditions that require reporting.</i>		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
General Comment:		
<i>The procedures for federal and state regulatory reporting are located on Pages 7-9 Sections 1 and 2. The procedures include the reporting requirements, time intervals, instructions for filing and submission of supplemental reports if warranted.</i>		
CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		Status
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Not Applicable
General Comment:		
<i>NRG does not operate or maintain service lines.</i>		
[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance	Not Applicable

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	requirements of §192.381?	
General Comment:		
<i>NRG is a transmission operator and does not install distribution piping.</i>		
INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
General Comment:		
<i>The procedure for backfilling and installation to prevent coating damage is located on Page 100.</i>		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Not Applicable
General Comment:		
<i>NRG does not install plastic pipe.</i>		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
General Comment:		
<i>The procedure for casings is located on Page 65.</i>		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Unsatisfactory
NOA Comment:		
<i>The O&M does not contain procedures for addressing underground clearance requirements associated with other underground structures in proximity of the pipeline. Sufficient clearance of underground structures must be maintained to allow for maintenance on the pipeline. If clearance requirements cannot be met additional measures must be taken to protect the pipeline.</i>		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Unsatisfactory
NOA Comment:		
<i>The O&M does not contain procedures detailing the minimum cover requirements for transmission pipelines in accordance with 192.327(a). Procedures must include the minimum cover requirements by location and soil conditions.</i>		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Not Applicable
General Comment:		
<i>NRG does not install plastic pipe.</i>		
SERVICE LINE INSTALLATION		Status
Category Comment:		
<i>NRG is a transmission operator and does not install service lines.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Not Applicable

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[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Not Applicable
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Not Applicable
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Not Applicable
CUSTOMER METERS AND REGULATORS		Status
<u>Category Comment:</u>		
<i>NRG operates a transmission lateral and is not a distribution operator.</i>		
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Not Applicable
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Not Applicable
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Not Applicable
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Not Applicable
NORMAL OPERATING AND MAINTENANCE PROCEDURES		Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for reviewing the O&M is located on Page 2 General Procedures.</i>		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		No
Do procedures clearly include the name of the reviewer and dates of reviews?		Yes
<u>General Comment:</u>		

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The revision log contains the date of revision or review, pages revised, description of change, name of reviewer, title and organization within the company.

[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Satisfactory
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General Comment:

The procedure for providing maps, records and operating history to personnel is located on Pages 4-6 Maps and Records.

[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Satisfactory
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General Comment:

The procedures for startup and shutdown of facilities to ensure the MAOP limits are not exceeded are located on Pages 13-14.

[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
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General Comment:

The procedures for review and modification of procedures if needed are located on Page 2 General Procedures.

[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Satisfactory
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General Comment:

The procedures for the use of equipment are located on Pages 101 and 102 Excavation Safety.

ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION

Status

[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Satisfactory
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General Comment:

The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.

[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	Satisfactory
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General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Satisfactory
General Comment:		
<i>The procedures for responding to abnormal operations are located on Pages 120-122 and include responding to an unintended closure of a valve, pressure limits, loss of communication, activation or operation of a safety device and notification of personnel to respond.</i>		
CHANGE IN CLASS LOCATION PROCEDURES		Status

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[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for class location changes are located on Pages 28-31 and contain the procedures for initiation of the change and confirmation or revision of the MAOP.</i>		
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for class location changes are located on Pages 28-31 and contain the procedures for initiation of the change and confirmation or revision of the MAOP.</i>		
CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for surveillance are located on Pages 97-98 and contain the review and analysis of records and the remedial action if a pipeline becomes unsatisfactory.</i>		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for surveillance are located on Pages 97-98 and contain the review and analysis of records and the remedial action if a pipeline becomes unsatisfactory.</i>		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Not Applicable
<u>General Comment:</u>		
<i>NRG operates a transmission pipeline and does not contain cast iron pipelines</i>		
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history,	Not Applicable

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	or any other unusual operating maintenance conditions?	
<u>General Comment:</u>		
<i>NRG operates a transmission pipeline and does not contain cast iron pipelines</i>		
DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-identifies persons who engage in excavating?	Satisfactory
<u>General Comment:</u>		
<i>The procedure requiring membership in the IL one call is located on Page 106 Section 1.</i>		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification to the public in the One Call area?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means for receiving and recording notifications of pending excavations?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification of pending excavations to the members?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up	Satisfactory

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	inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	
General Comment:		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory
General Comment:		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		No
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		Yes
General Comment:		
<i>The procedures for damage prevention and pipeline locating are located on Pages 106-113.</i>		
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Unsatisfactory
NOA Comment:		
<i>The O&M does not contain procedures for reporting third party damage to the transmission main if a release occurs to ICC JULIE Enforcement.</i>		
EMERGENCY PROCEDURES		Status
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	Satisfactory
General Comment:		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events, such as, gas odor inside or near a building?	Satisfactory
General Comment:		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		

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[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
<u>General Comment:</u>		

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<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such	Satisfactory

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	that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	
General Comment:		
<i>The emergency plans and procedures are located on Pages 113-119 and include the identification, classification and response to emergencies. These procedures include the prompt response, make safe procedures, coordination and review following the emergency.</i>		
Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?		No
General Comment:		
<i>NRG maintains a 2 mile transmission lateral with no buildings in the area.</i>		
FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory
General Comment:		
<i>The procedure for failure investigation is located on Pages 117-118. The procedure includes the use of laboratory services, consulting firms and corrosion personnel depending on the investigation.</i>		
MAOP PROCEDURES		Status
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Not Applicable
General Comment:		
<i>NRG does not maintain distribution pipelines.</i>		
[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	Not Applicable
General Comment:		
<i>NRG does not maintain distribution pipelines.</i>		
[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment:		
<i>The MAOP of the pipeline was determined by test pressures based on the applicable factors, the procedures include revision of the MAOP if class locations occur.</i>		
[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment:		
<i>The procedures for establishing the MAOP for steel pipelines are located on Pages 24-27.</i>		
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the	Satisfactory

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	MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	
General Comment:		
<i>The procedures for establishing the MAOP for steel pipelines are located on Pages 24-27.</i>		
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Satisfactory
General Comment:		
<i>The procedures for establishing the MAOP for steel pipelines are located on Pages 24-27.</i>		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	Satisfactory
General Comment:		
<i>The procedures for establishing the MAOP for steel pipelines are located on Pages 24-27.</i>		
[192.605(b) (5)]	Does the operator have procedures for start up and shut down within MAOP of the pipeline?	Satisfactory
General Comment:		
<i>The procedure for startup and shutdown of facilities is located on Pages 13-14.</i>		
Does the operator install pipelines to operate under alternative MAOP requirements?		No
General Comment:		
<i>NRG does not use the exemption allowed by 192.619(d) using the calculations under 192.620(a), if this method was used additional design and construction procedures would need to be included.</i>		
[192.605(a)][192.620(b) (4)]	If yes, does the operator have procedures to require the additional construction requirements included under 192.328?	Not Applicable
General Comment:		
<i>NRG does not use the exemption allowed by 192.619(d) using the calculations under 192.620(a), if this method was used additional design and construction procedures would need to be included.</i>		
[192.605(a)][192.328(b)]	If yes, does the operator have procedures requiring all girth welds to be non-destructively tested in accordance with 192.243 (b) and (c)?	Not Applicable
General Comment:		
<i>NRG does not use the exemption allowed by 192.619(d) using the calculations under 192.620(a), if this method was used additional design and construction procedures would need to be included.</i>		
PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Satisfactory
General Comment:		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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The procedure for testing pipe for repairs is located on Page 94 Pressure and Leak Testing.

[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	Satisfactory
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General Comment:

The procedures for Pressure and Leak Testing are located on Pages 94-96.

[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	Satisfactory
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General Comment:

The procedures for Pressure and Leak Testing are located on Pages 94-96.

[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
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General Comment:

The procedures for Pressure and Leak Testing are located on Pages 94-96.

[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Not Applicable
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General Comment:

NRG utilizes welding to join transmission pipeline segments.

[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory
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General Comment:

The procedure is located on Page 96 Pressure and Leak Testing.

[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS	Unsatisfactory
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OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	or more to be tested at or above the required test pressure for at least 8 hour?	
<u>NOA Comment:</u>		
<i>The O&M does not contain the minimum 8 hour strength test duration for pipelines operating above 30% SMYS.</i>		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	Satisfactory
<u>General Comment:</u>		
<i>The procedure stating pipeline components will be inspected to ensure they were constructed and tested according to industry standards is located on Page 2.</i>		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	Unsatisfactory
<u>NOA Comment:</u>		
<i>The O&M does not contain the minimum 4 hour strength test for fabricated units or short sections of pipe in which post installation tests are impractical. This exception is allowed under 192.505(c). If this minimum requirement is not used, procedures would need to detail the minimum requirements for testing of these facilities.</i>		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Not Applicable
<u>General Comment:</u>		
<i>NRG operates above the listed specifications under this requirement.</i>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Not Applicable
<u>General Comment:</u>		
<i>NRG operates above the listed specifications under this requirement.</i>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	Not Applicable
<u>General Comment:</u>		
<i>NRG operates above the listed specifications under this requirement.</i>		

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[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Not Applicable
<u>General Comment:</u>		
<i>NRG operates above the listed specifications under this requirement.</i>		
[192.13(c)][192.513(b)]	Does the operator's procedure insure discovery of all potentially hazardous leaks in the segment being tested?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not install or maintain plastic pipelines.</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not install or maintain plastic pipelines.</i>		
[191.13(c)][192.513(d)]	Does the operator's procedures require that when testing thermoplastic material the temperature may not be more than 100 F or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not install or maintain plastic pipelines.</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure and leak testing are located on Pages 94-96.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for Pressure and Leak Testing are located on Page 94 Section 2.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
<u>General Comment:</u>		

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The procedures for Pressure and Leak Testing are located on Page 94 Section 2.

[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
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General Comment:

The procedures for Pressure and Leak Testing are located on Page 94 Section 2.

[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory
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General Comment:

The procedure for the use of deadweight testing equipment, digital gauges and the calibration of such equipment is located on Page 94.

[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	Satisfactory
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General Comment:

The procedures for pressure and leak testing are located on Pages 94-96.

ODORIZATION of GAS PROCEDURES

Status

Category Comment:

The Transmission line does not contain odorized gas and does not require odorization.

[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	Not Applicable
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[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Not Applicable
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[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Not Applicable
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TAPPING PIPELINES UNDER PRESSURE PROCEDURES

Status

[192.627][192.627]	Does the plan provide for adequate tapping procedures for pipelines under pressure?	Satisfactory
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General Comment:

The procedures are located on Pages 92-93 Tapping Pipelines.

[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
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General Comment:

The procedures are located on Pages 92-93 Tapping Pipelines.

PIPELINE PURGING PROCEDURES

Status

[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of	Satisfactory
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OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	
General Comment:		
<i>The procedures for purging pipelines are located on Pages 17-20.</i>		
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
General Comment:		
<i>The procedures for purging pipelines are located on Pages 17-20.</i>		
MAINTENANCE PROCEDURES		Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
General Comment:		
<i>The procedure requiring the repair and replacement if a segment of pipe becomes unsatisfactory is located on Page 98.</i>		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
General Comment:		
<i>The procedure requiring immediate repair of hazardous leaks is located on Pages 80-85 Pipeline Repair.</i>		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory
General Comment:		
<i>The procedure for Patrolling and Leak Surveys are located on Pages 41-44 and include the methods, criteria and intervals for inspection.</i>		
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
General Comment:		
<i>The procedure for Patrolling and Leak Surveys are located on Pages 41-44 and include the methods, criteria and intervals for inspection.</i>		
[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Satisfactory

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General Comment:		
<i>The procedure for Patrolling and Leak Surveys are located on Pages 41-44 and include the methods, criteria and intervals for inspection.</i>		
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Not Applicable
General Comment:		
<i>NRG does not transport un-odorized gas in a class 3 or 4 class location.</i>		
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	Not Applicable
General Comment:		
<i>NRG does not transport un-odorized gas in a class 3 or 4 class location.</i>		
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
Category Comment:		
<i>NRG is a transmission operator and does not contain distribution pipelines at this location.</i>		
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Not Applicable
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	Not Applicable
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	Not Applicable
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Not Applicable
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector	Not Applicable

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	equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	
LINE MARKER PROCEDURES		Status
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pipeline markers are located on Pages 52-53.</i>		
TRANSMISSION RECORD KEEPING PROCEDURES		Status
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for the retention of records for repairs made to the pipeline are located on Page 85 Pipeline Repair.</i>		
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for additional repair requirements are located on Page 98 Surveillance.</i>		
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	Satisfactory
<u>General Comment:</u>		
<i>The procedure requiring the retention of records associated with subparts L and M are located on Page 4 Maps and Records.</i>		
TRANSMISSION FIELD REPAIR PROCEDURES		Status
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.713(b)]	Does the operator's procedure require that the	Satisfactory

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	operating pressure must be at a safe level during repair operations?	
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Satisfactory
General Comment:		
<i>The procedure for taking the pipeline out of service is located on Page 81 Pipeline Repair.</i>		
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b)	Satisfactory

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	then a full encirclement welded split sleeve of appropriate design must be installed?	
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged	Not Applicable

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	pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	
General Comment:		
<i>The pipeline segment is not submerged or in an inland navigable water way.</i>		
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
General Comment:		
<i>The procedures for pipeline repairs are located on Pages 80-85.</i>		
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Satisfactory
General Comment:		
<i>The procedure requiring replacement pipe be tested to the requirements of new facilities is located on Page 94 Pressure and Leak Testing.</i>		
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Satisfactory
General Comment:		
<i>The procedure for nondestructive testing is located on Page 88 Welding of Steel Pipelines.</i>		
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		Status
Category Comment:		
<i>NRG is a transmission operator and does not contain service lines.</i>		
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Not Applicable
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Not Applicable
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the	Satisfactory

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	pipeline is not being maintained?	
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities.</i>		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities.</i>		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	Satisfactory
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities.</i>		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Satisfactory
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities.</i>		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Satisfactory
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities.</i>		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
General Comment:		
<i>The procedures for abandonment or deactivation of facilities are located on Pages 21-23 and contain procedures for disconnection and sealing open ends, locking requirements and dismantling and removing facilities. The procedures also contain ensuring a combustible mixture is not present when air is used for purging.</i>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.605(b)][192.727(f)]	Does the operator's procedure require that each abandoned vault be filled with a suitable compacted material?	Not Applicable
General Comment: <i>NRG does not contain vaults at this location, all facilities are above ground.</i>		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Not Applicable
General Comment: <i>NRG does not contain pipelines that cross over or under a navigable water way at this location.</i>		
COMPRESSOR STATION PROCEDURES		Status
Category Comment: <i>NRG does not operate or maintain compressor stations.</i>		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Applicable
[192.605(b)(7)][192.605(b)(7)]	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?	Not Applicable
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	Not Applicable
[192.605(b)(7)][192.731(b)]	Does the operator's procedure require when any defective or inadequate relief device is found that it must be promptly repaired or replaced?	Not Applicable
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Applicable
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Applicable
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Applicable
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor	Not Applicable

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	buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	
PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control	Satisfactory

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	or relief pressure limit is as required by .739 (b).	
General Comment:		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Not Applicable
General Comment:		
<i>NRG monitors the pressure on the transmission lateral as well as the supplier's pipeline continuously. NRG does not operate a distribution system at this location.</i>		
[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Not Applicable
General Comment:		
<i>NRG monitors the pressure on the transmission lateral as well as the supplier's pipeline continuously. NRG does not operate a distribution system at this location.</i>		
[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	Satisfactory
General Comment:		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	Satisfactory
General Comment:		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	Satisfactory
General Comment:		
<i>The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.</i>		
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Satisfactory
General Comment:		

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The procedures for pressure limiting and regulating equipment is located on Pages 46-49 Overpressure Protection and Pressure Limiting Devices. The procedures contain the intervals for inspection, inspection requirements, responding to deficiencies and capacity reviews.

VALVE AND VAULT MAINTENANCE PROCEDURES		Status
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Satisfactory
<p><u>General Comment:</u> <i>The procedures for valve maintenance are located on Pages 54-55.</i></p>		
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Satisfactory
<p><u>General Comment:</u> <i>The procedures for valve maintenance are located on Pages 54-55.</i></p>		
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Not Applicable
<p><u>General Comment:</u> <i>NRG does not operate a distribution system at this location.</i></p>		
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Not Applicable
<p><u>General Comment:</u> <i>NRG does not operate a distribution system at this location.</i></p>		
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Applicable
<p><u>General Comment:</u> <i>NRG facilities do not contain vaults at this location.</i></p>		
[192.605(b)][192.179(a)]	Does the operator's procedure specify the minimum spacing requirements for transmission sectionalizing block valves?	Not Applicable
<p><u>General Comment:</u> <i>NRG operates a 2 mile transmission lateral in a class 1 location and does not contain in-line block valves. Due to the length of the line and the requirements of this section no in-line valves would be required.</i></p>		
[192.605(b)][192.179(c)]	Does the operator's procedure require between each transmission main line valve to have a blowdown valve with enough capacity to allow for as rapid blow	Not Applicable

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	down as practicable?	
General Comment:		
<i>NRG operates a 2 mile transmission lateral in a class 1 location and does not contain in-line block valves. Due to the length of the line and the requirements of this section no in-line valves would be required.</i>		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
Category Comment:		
<i>The procedures requiring the removal of ignition sources, prohibiting welding or cutting in an area that contain a combustible mixture and placement of warning signs are located on Pages 103-105 Prevention of Accidental Ignition and Minimizing Hazardous Condition.</i>		
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory
CAULKED BELL AND SPIGOT JOINTS PROCEDURES		Status
Category Comment:		
<i>NRG does not contain cast iron pipelines at this location.</i>		
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Not Applicable
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Not Applicable
PROTECTING CAST-IRON PIPELINE PROCEDURES		Status
Category Comment:		
<i>NRG does not contain cast iron pipelines at this location.</i>		
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or	Not Applicable

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	blasting?	
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Not Applicable
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	Not Applicable
[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	Not Applicable
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	Not Applicable
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Not Applicable
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		Status
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
General Comment:		
<i>The procedure is located on Page 86 and allows for the use of Section 5 or Section IX or the ASME Boiler and Pressure Vessel Code.</i>		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
General Comment:		
<i>The procedure stipulating the welding procedures to be recorded in detail is located on Page 86 Welding of Steel Pipelines.</i>		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
General Comment:		
<i>The procedures on Page 86 allow for the qualification of welders using either Section 6 of API or Section IX of the ASME Boiler and Vessel Code.</i>		

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[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Satisfactory
<u>General Comment:</u> <i>The requirement for qualification under Appendix C is located on Page 87.</i>		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Satisfactory
<u>General Comment:</u> <i>The procedures prohibiting welding on compressor station piping if non-destructive testing was used are located on Page 86.</i>		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
<u>General Comment:</u> <i>The procedure requiring use of a welding process within a 6 month period is located on Page 86.</i>		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Pages 86-87.</i>		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Pages 86-87.</i>		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Pages 86-87.</i>		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	Satisfactory

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<u>General Comment:</u>		
<i>The procedures are located on Pages 86-87.</i>		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory
<u>General Comment:</u>		
<i>The procedures located on Page 87 address weather considerations.</i>		
[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for joint alignment is located on Page 88.</i>		
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for proper welding surface preparation is located on Page 87.</i>		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for the inspection and examination of welds is located on Page 88.</i>		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for the inspection and examination of welds is located on Page 88.</i>		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
<u>General Comment:</u>		
<i>The procedure for the inspection and examination of welds is located on Page 88.</i>		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on	Satisfactory

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	pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	
General Comment:		
<i>The procedure for the inspection and examination of welds is located on Page 88.</i>		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	Satisfactory
General Comment:		
<i>The procedure for the inspection and examination of welds is located on Page 88.</i>		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory
General Comment:		
<i>The procedure located on Page 89 requiring each weld found unacceptable during visual or nondestructive examinations shall be repaired or removed.</i>		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
General Comment:		
<i>The procedure located on Page 90 requires the defect be removed down to sound metal and preheated if conditions exist that would adversely affect the quality of the weld.</i>		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Satisfactory
General Comment:		
<i>The procedures for previously repaired cracks or defects are listed on Page 83 Pipeline Repair.</i>		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		No
General Comment:		
<i>The procedures utilize the low hydrogen process, the procedures are listed on Pages 80, 86 and 92.</i>		
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		Status
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly	Satisfactory

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	indicates defects that may affect the integrity of the weld?	
General Comment:		
<i>The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.</i>		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Satisfactory
General Comment:		
<i>The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.</i>		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	Satisfactory
General Comment:		
<i>The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.</i>		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Satisfactory
General Comment:		
<i>The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.</i>		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	Satisfactory
General Comment:		
<i>The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.</i>		
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Satisfactory
General Comment:		

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The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.

[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	Satisfactory
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General Comment:
The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.

[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	Satisfactory
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General Comment:
The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.

[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Satisfactory
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General Comment:
The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.

[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Satisfactory
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General Comment:
The procedures for nondestructive examination are located on Pages 88-90 and include written procedures for personnel performing the tests, requirements based on class location and records associated with the test.

JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES	Status
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Category Comment:
NRG operates a transmission lateral and does not join plastic pipelines at this location.

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[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Not Applicable
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Not Applicable
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Not Applicable
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Not Applicable
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Not Applicable
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Not Applicable
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Not Applicable
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	Not Applicable
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Not Applicable
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Not Applicable
CORROSION CONTROL PROCEDURES		Status
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment:		
<i>The procedure requiring the design, installation and OM procedures must be carried out by qualified personnel is located on Page 58 Corrosion, General and Records.</i>		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	exceptions in code)	
<u>General Comment:</u>		
<i>The procedure detailing the requirements is located on Page 60 External Corrosion Control.</i>		
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not install aluminum pipelines at this location.</i>		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located on Page 60 and include the requirements for cathodic protection.</i>		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located on Page 60 and include the requirements for cathodic protection.</i>		
[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
<u>General Comment:</u>		
<i>The procedure stating material must be suitable to prevent atmospheric corrosion is located on Page 71 Atmospheric Corrosion.</i>		
[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for examination of buried pipe when exposed are located on Pages 60-61.</i>		

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[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
<u>General Comment:</u> <i>The procedures for Corrosion Control, Remedial Measures are located on Pages 73-79.</i>		
[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
<u>General Comment:</u> <i>The procedures outlining the criteria for cathodic protection requirements are located on Page 61.</i>		
[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	Satisfactory
<u>General Comment:</u> <i>Cathodic protection monitoring intervals are listed on Page 63.</i>		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Satisfactory
<u>General Comment:</u> <i>The procedure for rectifier monitoring are located on Page 63.</i>		
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>The procedures to monitor critical and non-critical bonds are located on Page 63.</i>		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u> <i>The procedures for remedial action to correct deficiencies indicated by monitoring are located on Page 63.</i>		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Not Applicable
<u>General Comment:</u>		

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NRG does not contain unprotected pipelines at this location.

[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory
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General Comment:
The procedures for electrical isolation are located on Page 63-66.

[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory
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General Comment:
The procedures for electrical isolation are located on Page 63-66.

[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	Satisfactory
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General Comment:
The procedures for electrical isolation are located on Page 63-66.

[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
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General Comment:
The procedures for electrical isolation are located on Page 63-66.

[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	Satisfactory
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General Comment:
The procedure detailing the number of test stations needed, how they will be installed and how they will be maintained is located on Page 66.

[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
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General Comment:
The procedure detailing the number of test stations needed, how they will be installed and how they will be maintained is located on Page 66.

[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Satisfactory
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General Comment:
The procedures for interference currents are located on Pages 66-67.

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> <i>The procedures for interference currents are located on Pages 66-67.</i>		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Not Applicable
<u>General Comment:</u> <i>NRG does not transport corrosive gas at this location.</i>		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	Satisfactory
<u>General Comment:</u> <i>The procedures for internal corrosion are located on Pages 68-70.</i>		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
<u>General Comment:</u> <i>The procedures for internal corrosion are located on Pages 68-70.</i>		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192,489?	Satisfactory
<u>General Comment:</u> <i>The procedures for internal corrosion are located on Pages 68-70.</i>		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
<u>General Comment:</u> <i>The procedures for internal corrosion are located on Pages 68-70.</i>		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Satisfactory
<u>General Comment:</u>		

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

The procedures for design and construction of a transmission line are located on Page 69.

[192.605(b)][192.476(c)]	Does the operator's procedure require an evaluation of the impact of internal corrosion to the downstream portion of the existing pipeline when a transmission pipeline configuration is changed to provide for removal of liquids and monitoring of internal corrosion as appropriate?	Satisfactory
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General Comment:

The procedures for design and construction of a transmission line are located on Page 69.

[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Not Applicable
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General Comment:

NRG does not transport corrosive gas at this location.

[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
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General Comment:

The procedures for atmospheric monitoring and control are located on Pages 70-72.

[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
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General Comment:

The procedures for atmospheric monitoring and control are located on Pages 70-72.

[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	Satisfactory
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General Comment:

The procedures for atmospheric monitoring and control are located on Pages 70-72.

[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
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General Comment:

The procedures for atmospheric monitoring and control are located on Pages 70-72.

[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
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OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<u>General Comment:</u>		
<i>The procedures requiring replacement pipe be externally coated are located on Page 73.</i>		
[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u>		
<i>The procedure for reducing the operating pressure due to general corrosion is located on Page 125 Safety Related Conditions.</i>		
[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for addressing localized corrosion are located on Pages 125.</i>		
[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	Satisfactory
<u>General Comment:</u>		
<i>The corrosion control remedial measures are located on Pages 73-79.</i>		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not contain distribution pipelines at this location.</i>		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not contain distribution pipelines at this location.</i>		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u>		
<i>NRG does not contain cast iron pipelines at this location.</i>		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u>		

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NRG does not contain cast iron pipelines at this location.

[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
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General Comment:

The procedures for corrosion control records is located on Page 59 and includes maps of the system, structures bonded to the pipeline, tests, survey and inspection. The procedures require the retention of these records for the life of the pipeline.

[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
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General Comment:

The procedures for corrosion control records is located on Page 59 and includes maps of the system, structures bonded to the pipeline, tests, survey and inspection. The procedures require the retention of these records for the life of the pipeline.

[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	Satisfactory
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General Comment:

The procedures for corrosion control records is located on Page 59 and includes maps of the system, structures bonded to the pipeline, tests, survey and inspection. The procedures require the retention of these records for the life of the pipeline.

UPRATING PROCEDURES	Status
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Category Comment:

The procedures for uprating pipelines located on Pages 37-40 contains the requirements listed under Subpart K, the procedures indicate before uprating occurs a detailed procedure will be created and followed.

[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	Satisfactory
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[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Satisfactory
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[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Satisfactory
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[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Satisfactory
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TRAINING	Status
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Category Comment:

Training is outlined on the following Pages 1, 43, 51, 55, 101, 102, 103, 114, 117, 119, 121 and Page 122 and includes the training associated with work being performed including responding to abnormal operations.

[520.10(a)(1)]	Does the operator's procedure contain adequate	Satisfactory
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	descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Satisfactory
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Satisfactory
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Satisfactory
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Satisfactory
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	Not Applicable
<u>General Comment:</u>		
<i>The operator is not a municipal or master meter operator.</i>		
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Satisfactory

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